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Plaintiffs' Co-Lead Counsel

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

CIVIL L.R. 7-11 and 79-5(f)

Judge: Hon. Vince Chhabria and
Hon. Jacqueline Scott Corley
Courtroom: 4, 17th Floor

Pursuant to Civil Local Rules 7-11 and 79-5(f) and the Stipulated Protective Order entered by the Court on August 17, 2018 (Dkt. No. 122), Plaintiffs hereby submit this Administrative Motion to Consider Whether Another Party's Materials Should be Sealed.

	Document	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
1	Plaintiffs' Reply in Support of Motion for Sanctions	Portions of Plaintiffs' Reply include material Facebook has designated Confidential under the Protective Order in this action.	Designating party to provide evidence, per Local Rule 79-5(f)
2	Declaration of Lesley E. Weaver and Derek W. Loeser in Support of Plaintiffs' Reply in Support of Motion for Sanctions	Portions of the Declaration include material Facebook has designated Confidential under the Protective Order in this action.	Defendant to provide evidence, per Local Rule 79-5(f)
3	Exhibits 71, 72, 73, 74, 86, and 87 to the Declaration of Lesley E. Weaver and Derek W. Loeser in Support of Plaintiffs' Reply in Support of Motion for Sanctions	Entire documents	Defendant to provide evidence, per Local Rule 79-5(f)

Because the following documents contain, reference, or summarize materials designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order entered in this action, Plaintiffs files the documents provisionally under seal. Pursuant to Local Rule 79-5(f)(3), Defendant, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: April 25, 2022

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: /s/ Derek W. Loeser
Derek W. Loeser

By: /s/ Lesley E. Weaver
Lesley E. Weaver

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Derek W. Loeser, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25th day of April, 2022, at Seattle, Washington.

By: /s/ Derek W. Loeser

Derek W. Loeser

CERTIFICATE OF SERVICE

I, Derek W. Loeser, hereby certify that on April 25, 2022, I electronically filed the foregoing document with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which will send electronic notification to all counsel of record. I also caused a copy of the under seal filings to be delivered to counsel for Defendant Facebook, Inc. via electronic mail.

/s/ Derek W. Loeser

Derek W. Loeser